

1 KIMBERLY P. STEIN, ESQ.
Nevada Bar No. 08675
2 Email: kstein@nevadafirm.com
JAMES D. BOYLE, ESQ.
3 Nevada Bar No. 08384
Email: jboyle@nevadafirm.com
4 HOLLEY DRIGGS WALCH
FINE WRAY PUZEY & THOMPSON
5 400 South Fourth Street, Suite 300
Las Vegas, Nevada 89101
6 Phone: 702/791-0308
Fax: 702/791-1912

7 *Attorneys for Defendant China Green Agriculture, Inc.*

8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 GLENN LITTLE,

12 Plaintiff,

13 vs.

14 CHINA GREEN AGRICULTURE, INC.;
15 ZHOUYU LI; LIANFU LIU; YONCHENG
16 YANG; and JOHN DOES 1-10,

17 Defendants.

CASE NO.: 2:19-cv-01756-JCM-NJK

**STIPULATION AND ORDER SETTING
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT FOR
BREACH OF FIDUCIARY DUTY AND
SHAREHOLDER OPPRESSION**

(FIRST REQUEST)

18 Pursuant to LR IA 6-1, Plaintiff GLENN LITTLE ("Plaintiff") and Defendant CHINA
19 GREEN AGRICULTURE, INC. ("CGA", and collectively with Plaintiff, the "Parties"), by and
20 through their respective counsel, hereby stipulate and agree as follows:

21 1. Plaintiff filed his Complaint for Breach of Fiduciary Duty and Shareholder
22 Oppression (the "Complaint") on October 9, 2019 (ECF No. 1).

23 2. Plaintiff effectuated service of the Complaint on CGA on October 14, 2019.
24 Pursuant to Fed. R. Civ. P. 12(a), CGA's responsive pleading to the Complaint is therefore due by
25 November 4, 2019.

26 3. CGA just recently engaged Kimberly P. Stein, Esq. and James D. Boyle, Esq. and
27 the law firm of Holley Driggs Walch Fine Puzey Stein & Thompson ("HDW") as its counsel in
this action.

28 ///

1 4. Thus, to accommodate CGA's recent engagement of counsel and provide HDW
2 with sufficient time to meet with representatives of CGA to prepare a responsive pleading, the
3 Parties hereby agree that CGA may have a two (2) week extension to file its responsive pleading
4 to the Complaint, such that its responsive pleading is now due on or before November 18, 2019.

5 This is the first extension requested in connection with submission of a responsive pleading
6 to the Complaint. The purpose of requesting this extension is to set a deadline for CGA to respond
7 to the Complaint, and to accommodate CGA's recent engagement of counsel and provide HDW
8 with sufficient time to meet with representatives of CGA to prepare a responsive pleading.

9 For these reasons, the Parties respectfully request that this Court approve the foregoing
10 stipulation.

11 DATED this 5th day of November, 2019.

DATED this 5th day of November, 2019.

12 **SNELL & WILMER. L.L.P.**

**HOLLEY DRIGGS WALCH FINE
PUZEY STEIN & THOMPSON**

13 /s/ John S. Delikanakis

/s/ James D. Boyle

14 JOHN S. DELIKANAKIS, ESQ. (NBN 5928)
15 MICHAEL PARETTI, ESQ. (NBN 13926)
16 3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169

KIMBERLY P. STEIN, ESQ. (NBN 8675)
JAMES D. BOYLE, ESQ. (NBN 8384)
400 South Fourth Street, Suite 300
Las Vegas, Nevada 89101

17 OFFIT KURMAN, P.A.

*Attorneys for Defendant China Green
Agriculture, Inc.*

18 Adam J. Rader, Esq. (PHV Forthcoming)
19 Lawrence E. Steckman, Esq. (PHV
20 Forthcoming)
10 East 40th Street
New York, New York 10016

21 *Attorneys for Plaintiff Glenn Little*

22
23 **ORDER**

24 **IT IS SO ORDERED.**

25
26 
UNITED STATES MAGISTRATE JUDGE

27 DATED: November 6, 2019
28